



**RE: EPA Review of "Sampling and Analysis Plan for Trenches 31 and 34 of the 218-W-5 Burial Ground," HNF-23614, Revision 0** 📎

**Dave Bartus** to: Conaway, Kathy (ECY)

05/16/2011 01:05 PM

I have not discussed this with Ron, Deb, or during the monthly status calls.

Perhaps I'm irrationally optimistic, but I'd hope that with even the first set of comments, Ecology would be able to address and resolve each of the issues. If not, then its fair game to raise elsewhere. Are you aware of anyone actually looking at my comments?

Dave

"Conaway, Kathy (ECY)"

Was this discussed between the 3 of you...

05/16/2011 12:48:05 PM

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From: "Conaway, Kathy (ECY)" <KCON461@ECY.WA.GOV>  
To: Dave Bartus/R10/USEPA/US@EPA  
Date: 05/16/2011 12:48 PM  
Subject: RE: EPA Review of "Sampling and Analysis Plan for Trenches 31 and 34 of the 218-W-5 Burial Ground," HNF-23614, Revision 0

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Was this discussed between the 3 of you or at the Jane-Rick meeting? Will there be perit conditions?

-----Original Message-----

From: Bartus.Dave@epamail.epa.gov [mailto:Bartus.Dave@epamail.epa.gov]  
Sent: Monday, April 18, 2011 11:10 AM  
To: Skinnerland, Ron (ECY); Singleton, Deborah (ECY)  
Cc: Conaway, Kathy (ECY)  
Subject: EPA Review of "Sampling and Analysis Plan for Trenches 31 and 34 of the 218-W-5 Burial Ground," HNF-23614, Revision 0

Ron and Deb:

I've completed a first-pass review of the document HNF-23614 provided during the Hanford inspection of Trenches 31 and 34. I've reviewed the document from both a technical perspective, and as it relates to the existing Dangerous Waste component of the Hanford RCRA permit. I've previously provided these comments to the NEIC inspection team for their consideration in their inspection report, but would also like to provide them to Ecology directly regarding on-going program implementation and Ecology follow-up.

While the facility is managing the Trench 31/34 leachate collection activities under the generator accumulation standards of WAC 173-303-200, there is a clear nexus to permit requirements, as information concerning Trench 31/34 leachate collected under this WAP can reasonably be expected to be used to satisfy LERF/ETF waste acceptance criteria. As you can see from the comments, there are both technical concerns with the waste analysis requirements, and disconnects between analysis conducted under this WAP, and waste acceptance requirements in the dangerous waste permit.

I'll be happy to provide further assistance with any questions you may have.

Dave

(See attached file: EPA Region 10 Review Comments LERF ETF Leachate Sampling

and Analysis Plan.docx)